## **United States Department of the Interior**

National Park Service Chattahoochee River National Recreation Area

Draft
Recreation and Management Alternatives for the Southern
Portion of the Johnson Ferry Unit



An Environmental Assessment written pursuant to the National Environmental Policy Act

April 2002 Kevin Cheri, Superintendent

# Recreation and Management Alternatives for the Southern Portion of the Johnson Ferry Unit

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#### I. PURPOSE AND NEED

#### Location of Proposed Federal Action

Chattahoochee River National Recreation Area (CRNRA) consists of a 48-mile segment of the Chattahoochee River and certain non-contiguous land areas scattered from just south of Buford Dam in Buford, Georgia to Peachtree Creek inside the city limits of Atlanta, Georgia. The park is located entirely within the piedmont physiographic province of Georgia. Refer to Figure 1, Chattahoochee River National Recreation Area Location Map.

This document, an Environmental Assessment written pursuant to the National Environmental Policy Act (NEPA), will analyze the ramifications of a federal action proposed at the southern portion of the Johnson Ferry Unit of CRNRA (also referred to as the 'project area'). The unit is delimited by the Chattahoochee River to the east, Columns Drive to the west, and Johnson Ferry Road to the north. Refer to Figure 2, Southern Portion of the Johnson Ferry Unit Location Map.

#### Objective of Environmental Assessment/Need for Decision

This Environmental Assessment will present management alternatives for the southern portion of the Johnson Ferry Unit. In particular, the areas currently being utilized as open, active (organized sport) recreation fields will be the focus. Refer to Photograph 1, Condition of the Southern Portion of the Johnson Ferry Unit, 1999. Two management alternatives and their associated environmental effects will be presented. From this presentation, the following decisions will be made:

What recreational uses are appropriate for the southern portion of the Johnson Ferry Unit of CRNRA (active or passive);

Should CRNRA maintain mowed, open field areas in the southern portion of the Johnson Ferry Unit for recreational purposes;

How can cultural and natural resources be preserved, protected, and/or restored under heavy visitor use and demand;

Should CRNRA actively seek to restore natural condition and function to the southern portion of the Johnson Ferry Unit?

#### Background and Context

The southern portion of the Johnson Ferry Unit was accessioned into CRNRA in August 1988 when the property was purchased from the Charles estate. Past agricultural use left the property in open fields largely void of trees. At the time of purchase, the Charles Estate was leasing the fields for recreational polo use. Large grazing animals (horses and cows) frequently utilized the portions of the open fields that were not used for sport.





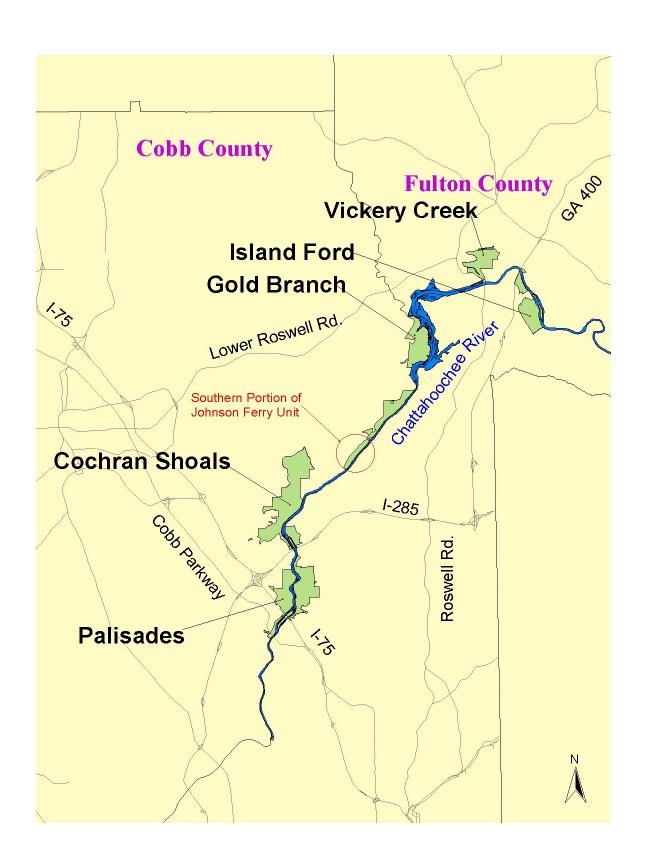
Figure 1
Chattahoochee River National Recreation Area Location Map







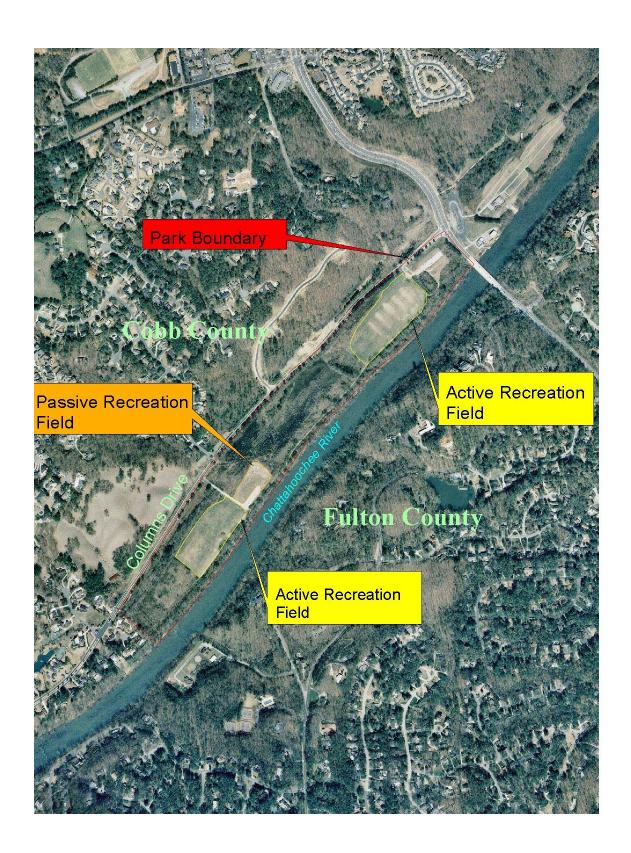
# Figure 2. Southern Portion of Johnson Ferry Unit Location Map







## Photograph 1. Condition of the Southern Portion of the Johnson Ferry Fields, 1999



Open fields and channelized waterways characterized the area. Refer to Photographs 2 and 3, Condition of the Southern Portion of the Johnson Ferry Unit, 1979.

Shortly after purchasing the land, CRNRA constructed two separate gravel entrance roads and associated 50-car parking lots in order to provide visitor access from Column's Drive. CRNRA also constructed a picnic pavilion to enhance recreational use. Large portions of the land were maintained in open recreational fields, which allowed the park concessionaire, Chattahoochee Outdoor Center, to rent the fields for large corporate sporting events. In addition to CRNRA management of the land, Colonial Pipeline Corporation maintains a linear natural gas transportation easement through the northern and southern portions of the Johnson Ferry Unit. Refer to Photograph 1 (Condition of the Southern Portion of the Johnson Ferry Unit, 1999).

On December 31, 2001, the concessionaire contract held by Chattahoochee Outdoor Center expired, necessitating the park to decide how to proceed with the management of recreational use in the area. Unfortunately, recreational use of the Johnson Ferry Unit has never been analyzed through the NEPA process. Therefore, the park has ceased all organized commercial and non-commercial recreation events in the unit pending the outcome of this Environmental Assessment. In November 2001, a letter was sent to all sport teams and parties that have been impacted by this decision (Refer to Appendix A, Coordination). The objective of this document is to identify an appropriate management alternative through the NEPA process. The management alternative chosen must allow for continued visitor use without impacting other park values (natural and cultural resources) in accordance with National Park Service policies and guidelines. The northern portion of the Johnson Ferry Unit does not support active recreation and will not be included in this document.

#### Relevant Laws

In 1916, Congress created the National Park Service in the Department of the Interior through the passage of the Organic Act. The act dictates:

[The National Park Service] shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations hereinafter specified...by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.





## Photograph 2 Condition of the Southern Portion of the Johnson Ferry Unit, 1979







## Photograph 3 Condition of the Southern Portion of the Johnson Ferry Unit, 1979



After the passing of the Organic Act, the National Park system grew substantially. As issues concerning the role of the system arose, Congress recognized the need to clarify the Organic Act. The 1970 General Authorities Act and a 1978 amendment to that act provide that clarification. The key point of those laws is:

The authorization of activities shall be construed and the protection, management, and administration of these areas shall be conducted in light of the high public value and integrity of the National Park System and shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress.

Each park was/is created by separate Congressional legislation that highlights its individuality. Public Laws 95-344 and 98-568 (CRNRA founding legislation) identify the specific purpose and need of Chattahoochee River National Recreation Area. Public Law 95-344 established CRNRA in August of 1978, while Public Law 98-568 further clarified the park's purpose in 1984:

The Congress finds the natural, scenic, recreation, historic, and other values of a forty-eight mile segment of the Chattahoochee River and certain adjoining lands in the State of Georgia from Buford Dam downstream to Peachtree Creek are of special national significance, and that such values should be preserved and protected from developments and uses which would substantially impair or destroy them.

The CRNRA enabling legislation charges the National Park Service with the responsibility of administering, protecting, and developing the recreation area in accordance with the Organic Act of August 25, 1916 (39 Stat. 535) and any other statutory authorities for the conservation and management of historic and natural resources. Table 1, Relevant Laws, outlines the other laws and statutory authorities relevant to this document.

In general, the *Management Policies 2001* manual published by the National Park Service provides service-wide policy for compliance with the laws and statutory authorities outlined in Table 1. Additionally, *NPS-77* (Natural Resources Management), a policy guidebook published by the National Park Service provides detailed service-wide policy for compliance with the laws and statutory authorities outlined in Table 1 as well. This Environmental Assessment will refer to both documents for broad National Park Service interpretation of laws and to the CRNRA founding legislation for park specific guidance.

Additionally, the National Parks Omnibus Act of 1998 provides direct guidance related to this document. The act was written in order to provide for improved management and increased accountability for certain National Park Service programs. Title IV of the act specifically addresses concessions management:

It is the policy of the Congress that the development of public accommodations, facilities, and services in units of the National Park System shall be limited to those accommodations, facilities, and services that (1) are necessary and appropriate for public use and enjoyment of the unit of the National Park System in which they are located; and (2) are consistent to the highest practicable degree with the preservation and conservation of the resources and values of the unit.

The National Environmental Policy Act of 1969 requires that all federal agencies strike a balance between use and preservation of natural and cultural resources. NPS policy guidance for compliance with NEPA is found in the *Director's Order #12* handbook, Conservation Planning, Environmental Impact Analysis, and Decision Making. This Environmental Assessment is written according to the standards outlined in that document.

#### Related Environmental Documentation and Guidance

CRNRA is in the process of developing a General Management Plan (GMP) for the entire park. When the GMP is released in draft format to the public, it will present four management alternatives for the park.

These management zones will define the level of resource protection and type of visitor experience that the park will strive for when developing management prescriptions and actions. The preferred alternative outlined in this Environmental Assessment does not conflict with any of the alternatives and management prescriptions currently under development through the GMP process. However, because the GMP has not yet been released to the public in draft form, the management zones and management prescriptions proposed by that document are subject to change. As the GMP develops, CRNRA will take measures to ensure that proposed changes to the GMP do not conflict with the outcome of this EA.

Although the GMP is currently incomplete, the document does contain a finalized purpose statement for the park:

The purpose of Chattahoochee River National Recreation Area is to lead the preservation and protection of the 48-mile Chattahoochee River corridor from Buford Dam to Peachtree Creek, and its associated natural and cultural resources, for the benefit and enjoyment of the people.

The purpose statement reflects the National Park Service ethic and general management policy. The following excerpts, taken from *Management Policies 2001*, provide guidance to assist in land management decisions involving natural and cultural resources as well as visitor use:

Impacts to natural systems resulting from human disturbances include the introduction of exotic species; the contamination of air, water, and soil; changes to hydrologic patterns and sediment transport; the acceleration of erosion and sedimentation; and the disruption of natural processes;

Biological or physical processes altered in the past by human activities may need to be actively managed to restore them to a natural condition or to maintain the closest approximation of the natural condition in situations in which a truly natural system is no longer attainable;

The Service will re-establish natural functions and processes in humandisturbed components of natural systems in parks unless otherwise directed by Congress;

Natural resources will be managed to preserve fundamental physical and biological processes, as well as individual species, features, and plant and animal communities;

In managing floodplains on park lands, the National Park Service will:

- Protect, preserve, and restore the natural resources and functions of floodplains;
- Avoid the long-and short-term environmental effects associated with the occupancy and modification of floodplains; and
- Avoid direct and indirect support of floodplain development and functions of floodplains or increase flood risks.

Table 1 Relevant Laws

Statutory or Policy Governing Steward Authority		Summary of Purpose		
Public Law 95-344	National Park Service	Preservation and protection of 48 miles of the Chattahoochee River and certain adjacent lands		
Public Law 98-568	National Park Service	Any Federal agency undertaking an action which may have a direct and adverse effect on CRNR must coordinate with the Secretary of the Interior		
Organic Act of 1916	National Park Service	Promotion and regulation of federal areas known as national parks, monuments, and reservations		
General Authorities Act of 1970	National Park Service	Areas comprising the national park system ar expressions of a single national heritage and ar managed as such		
Redwoods Amendment of March 27, 1978 (General Authorities Act)	National Park Service	The National Park Service is mandated to afford the highest standard of protection and care to park resources. No action that would compromise these resources is allowed, except when authorized specifically by Congress		
National Park Omnibus Management Act of 1998	National Park Service	The management and accountability of certain National Park Service Programs, including Concessions Management, is improved		
Clean Water Act Amendment to the Federal Water Pollution Control Act	U.S. Army Corps of Engineers	The natural and beneficial values of the Nation's waters are preserved and restored. The act contains provisions that are designed to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters"		
Historic Preservation Act	National Park Service in concert with the State of GA Historic Preservation Officer	National Register eligible Cultural Resources are protected from degradation		
National Environmental Policy Act	Council on Environmental Quality	All federal agencies consider the environmental effects of their actions		
Fish and Wildlife Coordination Act	U.S. Fish and Wildlife Service	All federal actions that may impact Waters of the U.S. are mitigated through coordination with the Fish and Wildlife Service		
Metropolitan River Atlanta Regional Commission				
Executive Order No. 11990	Executive Branch, U.S. Government	The natural and beneficial values of wetlands are preserved and enhanced		
Executive Order No. 11988	Executive Branch, U.S. Government	Natural floodplain values must be preserved or restored		
Executive Order No. 13112	Executive Branch, U.S. Government	Federal agencies must prohibit the introduction and spread of exotic invasive species		
Executive Order No.	Executive Branch, U.S.	Federal agencies must provide leadership in		
11514	Government	protecting and enhancing the Nation's environment by initiating measures necessary to direct their policies, plans, and programs to meet the Nation's environmental goals		

When practicable, the Service will not simply protect, but will seek to enhance, natural wetland values by using them for educational, recreational, scientific, and similar purposes that do not disrupt natural wetland function;

The National Park Service will employ the most effective concepts, techniques, and equipment to protect cultural resources against theft, fire, vandalism, overuse, deterioration, environmental impacts, and other threats, without compromising the integrity of the resource;

Archaeological resources will be managed in situ, unless the removal of artifacts or physical disturbance is justified by research.... Preservation treatments will include proactive measures that protect resources from vandalism and looting, and maintain or improve their condition by limiting damage due to natural and human agents;

Superintendents will develop and implement visitor use management plans and take management actions, as appropriate, to ensure that recreational uses and activities within the park are consistent with its authorizing legislation or proclamation and do not cause unacceptable impacts to park resources or values;

The Service is committed to providing appropriate, high quality opportunities for visitors to enjoy the park, and will maintain within the parks and atmosphere that is open, inviting, and accessible to every segment of American society. However, many forms of recreation enjoyed by the public do not require a national park setting, and are more appropriate to other venues. The Service will therefore:

- Provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks.
- Defer to local, state, and other federal agencies; private industry; and non-governmental organizations to meet the broader spectrum of recreational needs and demands.

National Park Service *Management Policies 2001* identifies recreational activities that are proposed as organized events or that involve commercialization, advertising, or publicity on the part of participants or organizers as "special events" that should comply with NPS Director's Order #53, Special Park Uses. Director's Order #53 coupled with the *Management Policies 2001* manual provide superintendents with the following guidance:

Special events – such as sports, pageants, regattas, public spectator attractions, entertainment, ceremonies, and encampments – may be permitted by the superintendent when (1) there is a meaningful associated between the park area and the event, and (2) the event will contribute to

visitor understanding of the significance of the park area. However, special event cannot be allowed if it results in an impairment of park resources.

Finally, in developing CRNRA founding legislation, Congress provided the following guidance documented through the legislative history of Public Law 95-344:

The House Report states that the NRA is not intended to provide playing fields, highly developed recreation centers or many other worthwhile programs offered by these [state and local] other agencies. Rather, the river and the associated lands are to be the resource base upon which the NPS can function to provide opportunities consistent with national park operations.

#### II. MANAGEMENT ALTERNATIVES

#### No Action/Open Recreation

Under the No Action/Open Recreation alternative, CRNRA would support the continuance of both active and passive recreation at the southern portion of the Johnson Ferry Unit. This alternative would allow CRNRA to maintain lawns/open activity fields, which would be mowed regularly to allow for recreational use. High capacity trails would be maintained throughout the area and all existing visitor support structures, including the picnic pavilion and parking lots, would remain in place. Other visitor support structures, such as drinking fountains and restrooms would be allowable. Corporations, sport leagues, and other organized groups would be able to reserve the Johnson Ferry fields for their specialized purposes.

While the Chattahoochee Outdoor Center no longer holds a concessionaire contract with the park, the fields still would be rented for organized sporting events under Incidental Business Permits and Special Use Permits until such time that the park enters into another concessionaire contract. Should the No Action/Open Recreation alternative be chosen, the permits would be authorized in accordance with Director's Order #53, the National Parks Omnibus Act of 1998, and other pertinent laws, policies, and regulations.

The southern portion of the Johnson Ferry Unit is located entirely within the floodplain of the Chattahoochee River; therefore, the mandates of Executive Order 11988, Floodplain Management as well as NPS guidelines and policies pertaining to floodplain management apply. Accordingly, this alternative is viable only upon the preparation and approval of a "statement of findings", which must prove that the No Action/Open Recreation alternative does not adversely affect floodplain function or value (it is an appropriate use), or that it is not practicable to relocate development and inappropriate human activities to an outside site that does not affect the floodplain. CRNRA would begin preparation of the "statement of findings" if the No Action/Open Recreation alternative were chosen through the completion of this Environmental Assessment. If the No Action/Open Recreation alternative were chosen, the decision document associated with

this assessment, the Finding of No Significant Impact, would not be completed until the "statement of findings" is prepared and submitted for public review.

The No Action/Open Recreation alternative does not appear to reflect the intent of Congress in establishing the park (refer to the legislative history of Public Law 95-344 quoted in the *Relevant Laws* section of this document). Additionally, the No Action/Open Recreation alternative does not address the National Park Service mandates to eliminate and control exotic species, restore natural function to wetlands and floodplains, and to manage for natural systems. If the No Action/Open Recreation alternative were to be chosen, CRNRA would have to make certain alterations to the current use of the field in order to comply with law and policy. The No Action Alternative is a required component of National Environmental Policy Act Environmental Assessments, but this does not authorize CRNRA to continue violating National Park Service policy. This alternative would only be viable if compliance with all laws, policies, and guidelines cited in this document could be achieved.

#### Environmentally Preferred/Passive Recreation

The Environmentally Preferred Alternative would close the southern portion of the Johnson Ferry fields to active recreational use. Passive recreation such as hiking, fishing, and wildlife viewing would be encouraged where impacts to natural and cultural resources are non-existent or determined to have no adverse effect on those resources. Although the only federal action that would directly result from the Environmentally Preferred/Passive Recreation alternative would be the cessation of active recreational use of the area, this alternative would set the stage for other natural and cultural resource restoration and preservation activities. Natural floodplain and wetland functions would be encouraged and, where possible, restored. Exotic vegetation would be discouraged and, where possible, eradicated. These restoration activities would be coordinated through subsequent National Environmental Policy Act documentation.

This alternative would set the stage for re-meandering artificially straightened (channelized) streams, restoring wetland hydrology and vegetation, and allowing the area to function as natural habitat for wildlife and vegetation. The restoration component of this alternative also would allow the area to function as a natural filter for upland pollutants carried from adjacent urban development. Currently, pollutants (sediment, fertilizers etc.) flow directly into the river through the unnatural channelized streams in the southern portion of the unit. This alternative would allow the park, if funding were obtained, to restore the natural stream meanders and allow streams to access their floodplains, utilizing the natural cleaning capacity of a healthy wetland environment. This alternative also would allow the park to remove non-native exotic pasture and lawn grasses from the Southern portion of the unit. These grasses do not occur naturally in the piedmont of Georgia and have resulted in a decline in the overall biodiversity of the area. The Passive Recreation/Environmentally Preferred alternative requires that the park support natural vegetation regimes.

The Environmentally Preferred/Passive Recreation alternative also would allow for the construction of wildlife viewing boardwalks and educational kiosks. This alternative would emphasize the traditional values associated with the National Park System and would allow park visitors to experience the Chattahoochee River floodplain in its natural state, as is proposed in the park GMP. Finally, the Environmentally Preferred/Passive Recreation alternative would address the natural and cultural resource preservation and management mandates of the National Park Service referenced in the *Related Environmental Documentation and Guidance* section of this document.

#### National Environmental Policy Act, Section 101(b)

Chattahoochee River National Recreation Area submits the above alternative as the Environmentally Preferred Alternative in accordance with Section 101(b) of the National Environmental Policy Act (<a href="http://es.epa.gov/oeca/ofa/nepa.html">http://es.epa.gov/oeca/ofa/nepa.html</a>). Refer to the Environmental Effects section of this document for further discussion.

#### III. AFFECTED ENVIRONMENT

#### General Setting

The Chattahoochee River, the primary resource of CRNRA, is part of the Apalachicola-Chattahoochee-Flint (ACF) River basin. The basin is located in Georgia, Alabama, and Florida and covers over 19,000 square miles. Recent studies by the U.S. Geological Survey have revealed that less than three percent of the ACF river basin is protected as a state or federal forest; most of the landscape has been altered by human use. The report estimates that 29 percent of the entire river basin is in agricultural use dominated by pasture. The southern portion of the Johnson Ferry Unit is part of the less than three percent of protected land in the basin, but a large percentage of the unit (21%) exists in open recreation fields or pasture.

The southern portion of the Johnson Ferry Unit is located entirely within the floodplain of the Chattahoochee River. This portion of the unit can be divided into three distinct ecological zones: the river and its banks, a flat first bottom comprised of Toccoa soils, and a backwater slough comprised of Cartecay silt loam, silty variant soils.

In 1957, the U.S. Army Corps of Engineers began to regulate the flow of the Chattahoochee River through their management of Buford Dam. Referring to Toccoa soils, the primary soil found in the southern portion of the Johnson Ferry Unit, the *Soil Survey of Cobb County, Georgia* (U.S. Department of Agriculture, 1973) states "these soils are flooded once in 5 to 20 years along the Chattahoochee River. Elsewhere they are flooded more often, usually in winter and spring." Taking this into account, CRNRA believes that prior to the construction of Buford Dam, the project area may have flooded as frequently as twice a year. However, due to the construction of Buford Dam and its impoundment, Lake Lanier, flood event frequencies in this area have been reduced to as little as once every 20 years.

The project area has been subject to intensive farming; no mature trees remain in the Toccoa bottom or the backwater slough. The river buffer varies from 30 to 60 feet of relatively mature vegetation. Maintained, frequently mowed, exotic pasture and lawn grasses dominate the Toccoa bottom, while portions of the backwater slough have naturally progressed into secondary ecological succession. However, succession in the backwater slough has been partially inhibited by maintenance activity associated with the easement held by Colonial Pipeline Corporation. The easement, which functions to transport natural gas, is located parallel to the river and runs longitudinally through the slough.

Perennial stream channels that would have meandered through the backwater slough and Toccoa bottom have been straightened to provide for enhanced farming operations. Beaver, taking advantage of this altered hydrology, have constructed dams within the channelized streams, leaving the existing Colonial Pipeline easement perpetually inundated.

#### Natural Resources

#### Special Aquatic Sites (Waters of the United States)

A survey of the southern portion of the Johnson Ferry Unit for jurisdictional Waters of the United States was begun in the winter of 2001 and completed in the spring of 2002. Jurisdictional waters were identified according to the 1987 U.S. Army Corps of Engineers Wetland Delineation Manual:

The term 'Waters of the United States' has broad meaning and incorporates both deepwater habitats and special aquatic sites, including wetlands (Federal Register 1982), as follows:

- a. The territorial seas with respect to the discharge of fill material.
- b. Coastal and inland waters, lakes, rivers, and streams that are navigable waters of the United States, including their adjacent wetlands.
- c. Tributaries to navigable Waters of the United States, including adjacent wetlands.
- d. Interstate waters and their tributaries, including adjacent wetlands.
- e. All others waters of the United States not identified above, such as isolated wetlands and lakes, intermittent streams, prairie potholes, and other waters that are not a part of a tributary system to interstate waters or navigable waters of the United States, the degradation or destruction of which could affect interstate commerce.

Although the level of protection afforded isolated waters of the U.S by the Clean Water Act (and described in the above definition) has been reduced by recent litigation (Solid Waste Agency of Northern Cook County (SWANCC) vs. U.S. Army Corps of

Engineers), National Park Service policy, relying on U.S. Fish and Wildlife standards, does not distinguish between isolated and navigable waters when affording these sites special protection (Executive Order No. 1190; *Management Policies 2001; NPS-77*). This Environmental Assessment will discuss the effects of the proposed alternatives on all special aquatic sites.

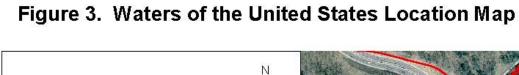
Although the entire southern portion of the Johnson Ferry site comprises one special aquatic site (floodplain with associated riparian wetland and stream complex), this document will segment the resource for discussion purposes. Four streams and one large wetland site were identified during the winter 2001 and spring 2001 natural resource surveys. Refer to Figure 3, Waters of the United States Location Map.

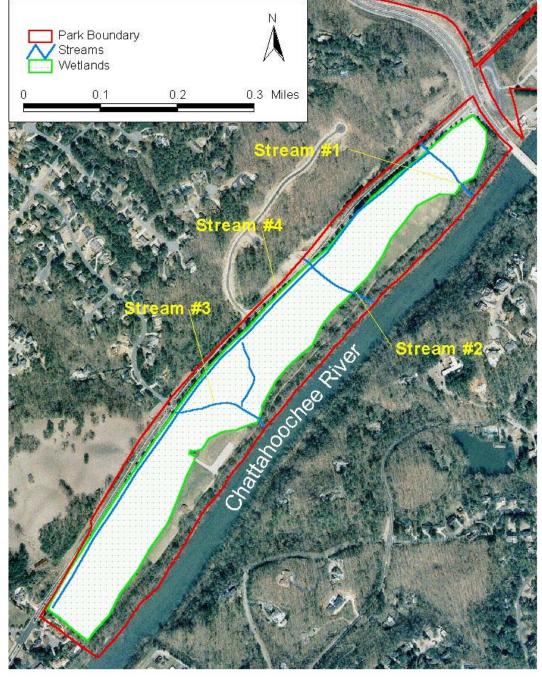
Stream 1 is a channelized tributary of the Chattahoochee River. In 1979, the banks of the stream were void of vegetation) and the stream channel itself was impounded (Photograph 1). Presently, the impoundment has been breached, leaving large remnant slabs of concrete in the channel. Beaver have moved into the area—and constructed natural dams where the artificial dam remnants lie. Beyond the beaver impoundment, the stream is highly incised. The banks are approximately 10 feet high and approximately 8 feet wide, while the channel is approximately 1.5 feet wide and is less than 1 foot deep.

Stream 2 is a beaver impounded channelized tributary of the Chattahoochee River. Approximately 40 feet from its confluence with the river, the stream has been routed through a large diameter culvert (3 to 4 feet), which was installed prior to land's inclusion in Chattahoochee River National Recreation Area. The culvert has been dammed by beaver, flooding a large portion of the land upstream. Downstream of the culvert, the stream is highly incised. The banks are approximately 10 feet high and approximately 8 feet wide, while the channel is approximately 1 foot wide and flows less than 1 foot deep.

Stream 3 is a channelized tributary of the Chattahoochee River. Approximately 40 feet from the confluence with the river, the stream has been routed through a large diameter culvert (3 to 4 feet), which was installed prior to the land's inclusion in the recreation area. Beaver are active in the area; the culvert has been dammed and the land upstream is partially flooded. Downstream of the culvert, the stream is incised similar to streams 1 and 2.

Stream 4 is a channelized watercourse that flows parallel to Column's Drive. The stream may have been created during the construction of Columns Drive or it may have been created to function as a wetland drainage ditch during the time the land was actively farmed. The existing channel is approximately 3 feet wide and 2 feet deep.





Stream 5 is the mainstem of the Chattahoochee River, which forms the southeastern boundary of the southern portion of the Johnson Ferry Unit. The river begins in the Blue Ridge physiographic province of Georgia and flows approximately 430 miles through Georgia, Alabama, and Florida, where it joins with the Flint River to form the Apalachicola River. The Apalachicola River then meets the Gulf of Mexico approximately 106 miles downstream.

The 1990 U.S. Fish and Wildlife Service National Wetland Inventory (NWI) Map identifies five separate wetland systems within the Southern portion of the Johnson Ferry area. The systems are identified as palustrine, but vary from scrub-shrub to broad-leaved deciduous. Four of the systems are identified as having significant human-caused alterations. Two systems are labeled as excavated, two systems are labeled as diked/impounded. The fifth system is labeled as a palustrine broad-leaved deciduous, temporarily flooded wetland. Refer to Figure 4, National Wetland Inventory Map.

CRNRA scientists found wetland delineation in the project area particularly difficult due to the multiple layers of human disturbance on the land. Soil testing for wetland delineation purposes usually is done to a depth of sixteen inches below the surface, but the fields in the southern portion of the Johnson Ferry Unit have been plowed extensively through agricultural use. Wetland indicators normally easily seen in soils such as mottling, soil chroma, and oxidation have been blended together and then compacted as grazing animals, polo horses, and finally park-authorized sport teams utilized the land. Nonetheless, soil pits were dug at random throughout the fields to the depth recommended by the 1987 U.S. Army Corps of Engineers Field.

Soils that showed any evidence of hydric characteristics (mottling, oxidized root channels, low chromas) were recorded as hydric. Soils that showed no evidence of hydric characteristics were recorded as upland. Figure 3, Waters of the United States Location Map, shows the final extrapolation of the data collected during the Fall and Winter 2001 field surveys.

All surveys were overseen by a certified wetland delineation professional (CRNRA Natural Resource Manager). The difference between the NWI map and the park wetland delineation can be contributed to the fact that NWI maps were created from aerial photography and do not reflect small-scale changes in soil chemistry. Also, the NWI map notes human alteration, but does not attempt to describe the nature of the land prior to the impacts.

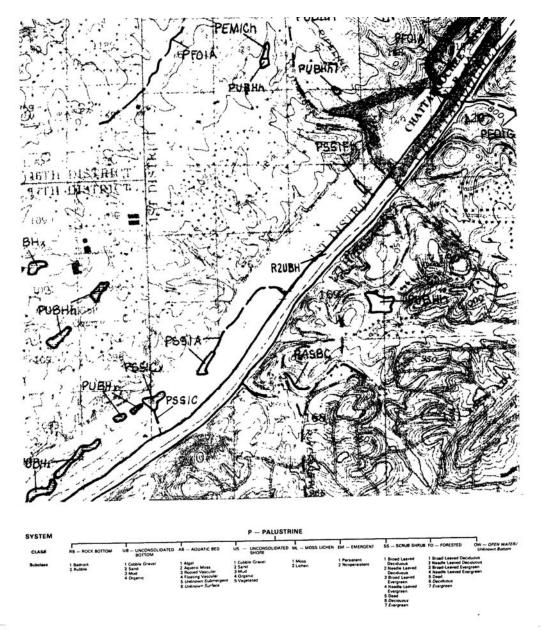
#### Protected Species

A wide variety of protected species find habitat within CRNRA. Table 2, Protected Species, details the state and federally listed species that may find habitat throughout the forty-eight mile park corridor. Protected species information was obtained from the U.S. Fish and Wildlife Service (<a href="http://endangered.fws.gov/wildlife.html">http://endangered.fws.gov/wildlife.html</a>) and the Georgia Department of Natural Resources (<a href="www.dnr.state.ga.us">www.dnr.state.ga.us</a>).





Figure 4. National Wetland Inventory Map



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### Table 2 Protected Species Part I

Common Name	Binomial	Preferred Habitat	Protection Status*	Habitat Present
Red-cockaded woodpecker	Picoides borealis	Mature pine with low understory vegetation	FE, SE	No
Bachman's sparrow	Aimophila aestivalis	Open pine or oak woods; old fields; brushy areas	SR	Yes
Swallow-tailed kite	Elanoides forficatus	River swamps; marshes	SR	Yes
Peregrine falcon	Falco peregrinus	Rocky cliffs & ledges; seacoasts	SE	No
Bald eagle	Haliaetus leucocephalus	Edges of lakes & large rivers; seacoasts	FT, SE	Yes
Bluestripe shiner	Cyprinella callitaenia	Flowing areas in large creeks and medium-sized rivers over Rocky substrates	ST	Yes
Highscale shiner	Notropis hypsilepis	Flowing areas of small to large streams over sand or bedrock substrates	ST	Yes
Shinyrayed pocketbook mussel	Lampsilis subangulata	Sandy/rocky medium-sized rivers & creeks	FE, SE	Yes
Gulf moccasinshell mussel	Medionidus penicillatus	Sandy/rocky medium-sized rivers & creeks	FE, SE	Yes
Georgia aster	Aster georgianus	Upland oak-hickory-pine forests and openings; sometimes with Echinacea laevigata or over amphibolite	FC	No
Pink ladyslipper	Cypripedium acaule	Upland oak-hickory-pine forests; piney woods	SU	No
Dwarf mountain witch alder	Fothergilla major	Rocky (sandstone, granite) woods; bouldery stream Margins	ST	No
Indian olive	Nestronia umbellula	Mixed with dwarf shrubby heaths in oak-hickory-pine woods; often in transition areas between flatwoods and uplands	ST	No
Yellow lady slipper	Cypripedium calceolus	Upland oak-hickory-pine or mixed hardwood forests	SU	No

Table 2 Protected Species Part II

Common Name	Binomial	Preferred Habitat	Protection Status*	Habitat Present?
Goldenseal	Hydrastis	Rich woods in circumneutral	SE	No
	canadensis	soil		
Ginseng	Panax	Mesic hardwood forests; cove	SU	No
	quinquefolius	hardwood forests		
Bunchflower	Melanthium	Mesic deciduous hardwood	SR	No
	latifolium	forests		
Shuttleworth's	Hexastylis	Low terraces in floodplain	SU	Yes
ginger	shuttleworthii	forests; edges of bogs		
Monkey-face	Platanthera	Wet thickets; seepy open	ST	Yes
orchid	integrilabia	northern hardwood forests		
Bay star-vine	Schisandra glabra	Rich woods on stream terraces	ST	Yes
	_	and lower slopes		
Piedmont barren	Waldsteinia lobata	Stream terraces and adjacent	ST	No
strawberry		gneiss outcrops		
Michaux's	Rhus michauxii	Open forests over ultramafic	FE, SE	No
sumac		rock		
Whitlow grass	Draba aprica	Granite and amphibolite	SE	No
		outcrops, usually in red cedar		
		litter		
Little	Amphianthus	Shallow pools on granite	FT, ST	No
amphianthis	pusillus	outcrops		
Black-spored	Isoetes	Sandy or rocky open woods	FE, SE	No
quillwort	melanospora	usually on ridges with a		
	_	disturbance history		
Granite rock	Sedum pusillum	Granite outcrops among	ST	No
stonecrop		mosses in partial shade under		
		red cedar trees		

\*Key: FE=Federally Endangered, FT=Federally Threatened, FC=Federal Candidate Species, SE=State Endangered, SR=State Rare, SU=State Unusual

CRNRA biologists conducted pedestrian surveys of the southern portion of the Johnson Ferry Unit in the winter of 2001/2002 in order to identify what protected species may find habitat within the area. Each species identified as having potential habitat within the project area is discussed below. Technical information about habitat and appearance was obtained from the Georgia Department of Natural Resources' *Protected Animals of Georgia* (Georgia Department of Natural Resources, 1999) and *Protected Plants of Georgia* guidebooks (Georgia Department of Natural Resources, 1995).

Bachman's sparrow finds habitat in mature pinewoods, regenerating clearcuts, and old pastures with a dense groundcover of grasses. The bird is most common in the coastal plain of Georgia, but has been identified in Murray, Cherokee, and Bartow counties. Both Cherokee and Bartow counties border Cobb County, where the Johnson Ferry Unit is located. It is unlikely that the bird could be found in the mowed exotic grass fields of the Southern portion of the Johnson Ferry area because it prefers native wiregrass and broomsedge grass habitats. Adult Bachman's sparrows have alternating reddish-brown and gray vertical stripes running down their backs from the nape of their necks to the top of their rumps. CRNRA has no records of a bird of this description being found in the vicinity of the Johnson Ferry fields. Loss of suitable habitat is the primary reason for the decline of the sparrow. Conversion of grassy fields to row crops or intensively grazed or mowed pastures (as is the current situation in the southern portion of the Johnson Ferry Unit) have resulted in a seven percent decrease in Bachman's sparrow populations over the last 30 years.

In Georgia, swallow-tailed kites are found predominately in riparian habitats associated with major river systems of the lower coastal plain; however, a sighting has been recorded for Forsyth County. Cobb County, where the Johnson Ferry fields are located is adjacent to Forsyth; therefore, there is a remote possibility that the kite could occur in area. The kite is known to nest in bottomland forests bordering major rivers. Tall pine or cypress trees provide nesting habitat while open grassy areas provide foraging habitat. The Johnson Ferry area could have provided such habitat prior to the time it was cleared for agriculture, but the fragmented nature of the wetlands reduces the likelihood that the bird could find habitat in the area today. The kite is easily identified by its bold black and white plumage and deeply forked tail. CRNRA has no record of the kite having been identified within the park.

Adult bald eagles find habitat along coastal waterways and major rivers, wetlands, and reservoirs in North America. The eagles often nest in mature, open-topped pines near large bodies of water. The nests are reused each year and can become very large over time. As of 1999, there were 48 known nest sites in Georgia. Bald eagles are recognized by their dark brown bodies and contrasting white heads and tails. The closest known eagle sighting to the Johnson Ferry fields is in Cherokee County; however, park biologists believe that eagles may use CRNRA as foraging habitat.

Bluestripe shiners are found in the Apalachicola River drainage. They occur in the mainstem Apalachicola, Chattahoochee, and Flint rivers in addition to their major tributaries. The shiners find habitat in the riffles and runs of large warm water streams

and rivers with rubble or sand substrates. Although the Chattahoochee River in the area of the Johnson Ferry Unit has been impacted by cold-water releases from Buford Dam, the fish may still be found in the area.

Highscale shiners are often found near the confluence of large tributary streams with the Chattahoochee and Flint Rivers. The fish inhabit runs and pools over sand and bedrock substrates. Habitat loss due to sediment run-off from land-disturbing activities is the primary reason for the decline of the rare shiner. The tributaries that join the Chattahoochee River from Johnson Ferry fields have been heavily impacted by agriculture use; the streams no longer maintain their natural meanders or hydrology. The park maintains the hope that these negative impacts have not resulted in the extirpation of the highscale shiner from the area.

The shinyrayed pocketbook mussel finds habitat in clean sand or silty sand substrates in areas of slow to moderate current in medium sized creeks and/or rivers. The mussel is extremely rare, but was originally described in the Chattahoochee River at Columbus. Since that time, populations were discovered as far north as Fulton County. Mussels are threatened by water quality deterioration. Unfortunately, water quality in the Chattahoochee River has been impacted by urban and agricultural run-off, sedimentation, and sewage spills. These impacts have reduced the likelihood that the shinyrayed pocketbook mussel could be found near the Johnson Ferry fields. However, no recent surveys exist for this area and the park maintains hope that the mussel could be found in the region. Until surveys are completed that prove the presence or absence of the species, the park will operate under the assumption that the mussel can be found in the Chattahoochee River.

Gulf moccasinshell mussels can be found in medium streams to large rivers with slight to moderate currents flowing over sand and gravel substrates. All of the of the known remaining gulf moccasinshell mussel populations are found in South Georgia. The majority of these populations are found in tributaries of the Flint River, but a few populations exist within the lower Chattahoochee and Chipola systems as well. Historically, the Chattahoochee River at the Johnson Ferry Unit supported gulf moccasinshell mussels and no recent surveys have been conducted in this area. Biologists are concerned that water quality in the river is too impacted to support gulf moccasinshell mussels today. However, until surveys are completed that prove the presence or absence of the species, the park will operate under the assumption that the mussel can be found in the Chattahoochee River.

Populations of Shuttleworth's ginger have been identified in Cobb County and adjacent jurisdictions. The plant finds habitat in peaty soils on the edges of forested bogs in the piedmont, moist hammocks, and bases of bluff forest slopes along and within floodplain forests. Shuttleworth's ginger is a perennial herb easily identified by its heartleaf shape and strong ginger scent. The leaves are evergreen and can be seen year-round. The wetlands at the Johnson Ferry Unit could provide habitat for the plant; however, no Shuttleworth's ginger was seen during the natural resource survey of the site.

Populations of monkeyface orchid have been identified within Cobb County. The plant finds habitat in red maple-blackgum swamps, along damp stream margins, or on thinly vegetated slopes. The banks of the channelized streams found at the southern portion of the Johnson Ferry area could provide habitat for the protected orchid, but this is unlikely due to the impacted state of the watercourses. The streams are incised and very rarely access their artificial (they have been relocated from their natural course) floodplains. The best search time for the monkeyface orchid is from mid July to late August. Natural resource surveys were not conducted in the Johnson Ferry fields at this time.

Bay star-vine can be found twining on subcanopy trees and shrubs in rich alluvial woods. The riverbanks and wetlands found in the project area provide suitable habitat for bay star-vines. The Georgia Department of Natural Resources Natural Heritage Program has noted several occurrences of the bay star-vine in North Atlanta, so the potential of this plant to occur within the project area is high. The best search time for bay star-vine is from late spring to midsummer. Surveys were not conducted during this time.

#### Fish and Wildlife

A variety of fish and wildlife depend on Chattahoochee River National Recreation Area for habitat in an otherwise urban environment. Currently, significant gaps in park inventory data prohibit park staff from knowing with certainty the full range of biodiversity found within the park. In order to remedy this lack of knowledge, the park is participating in the National Park Service Inventory and Monitoring Program. The goal of the program is to document 90% of vertebrates and vascular plants in national parks with significant natural resources. Surveys for park herpetofauna will begin in the spring of 2002, while surveys for small mammals are expected to begin in 2003. Until these surveys are completed, the park will rely on less formal reports of fauna sightings.

It is expected that the Johnson Ferry Unit supports a wide variety of small mammals, including beaver, squirrel, rabbit, mink, opossum, and fox. Common large mammals such as deer find habitat within the unit, but large predatory animals were extirpated from the area as urban development increased. Sporadic reports from visitors and adjacent homeowners confirm that coyotes may be moving into the metropolitan Atlanta area; however, these reports have not been confirmed in the Johnson Ferry Unit.

Construction of Buford Dam and its impoundment, Lake Lanier, has substantially changed the type of habitat available to aquatic organisms in the Chattahoochee River. Water to support river flow exists Buford Dam from the bottom of Lake Lanier, causing the river to flow cold throughout the year. The cold-water effect is mitigated somewhat by Morgan Falls Dam, located approximately 35 river miles downstream of Buford Dam. Because Bull Sluice Lake, Morgan Falls Dam's impoundment, slows the water, it has a warming effect on the river. Taking this into consideration, the Georgia Department of Natural Resources has established an active put-and-take trout fishery from Buford Dam downstream to Morgan Falls Dam and a put-grow-and-take trout fishery below Morgan Falls Dam, where the Johnson Ferry Unit is located. Brown and Rainbow trout, both non-native species, are introduced into the river as part of this program.

A total of 39 native and exotic fish species are known to occur within the river within the limits of the recreation area (Kunkle and Vana-Miller, 2000). Compared to other unregulated southeast rivers, the fish diversity of the Chattahoochee River is extremely low. This lack of diversity is attributed to the flow and temperature alteration caused by Buford Dam.

#### **Migratory Birds**

The National Park Service recognizes that migratory birds are of great ecological value. As such, NPS has committed, pursuant to Executive Order 13186, Responsibilities of Federal Agencies To Protect Migratory Birds, to develop and implement a Memorandum of Understanding with the U.S. Fish and Wildlife Service to promote the conservation of migratory birds when a proposed action may impact the birds.

Bird surveys are expected to begin in CRNRA in the year 2004 as part of the National Park Service Inventory and Monitoring Program. Until the surveys are complete, the park must rely on information gathered from the informal reports of local birders and organizations. Scientists commonly agree that more than 180 neotropical songbird species such as tanagers, warblers, vireos and thrushes depend on southern forests for nesting and breeding ground. Unfortunately, these migratory bird populations have declined significantly over the past few decades. Scientists attribute this decline to habitat loss associated with human intervention with the natural environment. The southern portion of the Johnson Ferry Unit is a prime example of this human intervention. Cleared forests, channelized streams, and ditched/drained wetlands dominate the landscape. Some migratory songbirds with non-specific habitat requirements may utilize the area, but the park does not expect that the land is still capable of supporting rarer birds.

#### **Physical Resources**

#### Air Quality

The project area is located within one of the most rapidly developing areas in the United States. Metropolitan Atlanta air emissions generated by the large volumes of cars, trucks, and airplane traffic in Atlanta have resulted in frequently poor air quality within CRNRA. According to the Georgia Environmental Protection Division, Metro-Atlanta has not met National Ambient Air Quality standards for ground-level ozone since it began ozone monitoring in the early 1980s. However, the area is in compliance with all other National Ambient Air Quality Standards.

The U.S. Environmental Protection Agency recognizes three levels of air quality protection concerning land areas. National parks over 6,000 acres and national wilderness areas over 5,000 acres are given Class I protection status, the highest level of air quality protection. CRNRA is considered a Class II protection area, while the land surrounding CRNRA is considered a Class III protection area. This additional air quality

protection afforded CRNRA mandates the park to remedy existing impacts to air pollution and to prevent future impacts to air pollution (this is also mandated by National Park Service policy).

#### Water Quality

Water quality of the Chattahoochee River and tributary streams within the park has been and continues to be affected by various sources of pollution. Although the Chattahoochee River within the CRNRA does have water quality problems as described in this section, the Georgia River Care 2000 assigned an "outstanding" rating to the segment of the river within the CRNRA. This rating is based on the assignment of this mainstem section of the river as a secondary trout stream. A secondary trout stream is one that is capable of supporting trout throughout the year, but which does not support naturally reproducing populations. This rating is currently being reassessed by the Georgia Environmental Protection Division in view of the recent finding of naturally reproducing brown trout in the upper portion of the Chattahoochee River within the CRNRA.

Water quality problems in the Chattahoochee River are exacerbated by the fact that many tributaries of the mainstem river are heavily polluted. The U.S. Environmental Protection Agency, through section 303 of the Clean Water Act, has established Total Maximum Daily Loads (TMDL) for water borne pollutants. The TMDL is the total amount of pollutant that is allowable in a particular body of water per day. Watercourses that exceed their established TMDL are placed on a list of impaired waters and are targeted for rehabilitation. Within the Upper Chattahoochee River watershed, 85% of all tributaries of the Chattahoochee River are on the list of impaired waters (http://oaspub.epa.gov/waters/state\_rept.control?p\_state=GA).

Many forms of water pollution have affected the project area. Non-point source runoff from impervious (impenetrable by water) and exposed surfaces in urban and suburban areas contains suspended solids, trace metals, organic compounds, and various pathogens. Because the project area is located at the lowest point within a highly developed suburban neighborhood, these pollutants run downstream into the Johnson Ferry Unit and flow into the Chattahoochee River from there. Furthermore, in 1999, CRNRA records showed that a total of approximately 26 million gallons of raw or partially treated sewage was spilled into the Chattahoochee River and/or it's tributaries within the CRNRA. Unfortunately, the all too common sewage spills that caused this figure to be alarmingly have continued. CRNRA data shows that park waters failed to meet federally established water quality standards related to *E. coli* concentrations 30% sample times in 2001. Between April 1999 and January 2002, 789 sewage spills resulted in over 146 million gallons of sewage flowing into the Chattahoochee River.

Sedimentation form erosional run-off also results in water quality degradation. Within the southern portion of the Johnson Ferry Unit, heavy siltation is noticeable in wetlands and streams. Recent siltation from development directly across from the project area has resulted in resource damage to the immediate project area. Faulty erosion control

structures resulted in the dumping of massive quantities of silt into park wetlands on several occasions. Erosional siltation of this type results in alteration of stream floodflows, decreases in biologic activity (as organisms are smothered by silt), and an increase in opportunity for exotic plant species invasion (as native vegetation is suffocated).

#### Soils/Geology

The project area is located in the floodplain of the Chattahoochee River, which flows along the Brevard Fault through the piedmont province of Georgia. The soils found in the southern portion of the Johnson Ferry Unit are mapped by the U.S. Department of Agriculture Soil Survey of Cobb County, Georgia as Toccoa and Cartecay silt loam, silt variant.

Toccoa series soils, as defined by the U.S. Department of Agriculture, "consists of deep, well-drained soils on narrow to broad first bottoms of streams, in depressions near heads of drainageways, and at the base of slopes on uplands." Most soils of the Toccoa series are subject to flooding. The Cartecay series, silt variant soils are "deep, somewhat poorly drained soils on floodplains." Cartecay soils are subject to flooding once or twice a year.

The southern portion of the Johnson Ferry Unit, although heavily impacted by human use, contains 4 perennial watercourses and one large palustrine seasonally flooded wetland system (refer to the *Special Aquatic Sites* section of this document).

#### Noise

Two major suburban thoroughfares delimit the project area: Column's Drive and Johnson Ferry Road. No formal noise surveys have been conducted in this area; however, traffic noises can be heard in the project area at all times of day. Additionally, the southern portion of the Johnson Ferry Unit is located near Rivercliff II, a major housing development. Sounds of everyday life such as lawnmowers, leaf blowers, and construction are common within the unit. Finally, during the past ten years, the unit has been the site of as many as fifty formal team sport practices per week and has also been the site of many regular team competitions. These large gatherings of people have led to the submittal of many complaints by local residents adjacent to the southern portion of the Johnson Ferry Unit.

#### **Cultural Resources**

Existing and potential cultural resources (archeological, historical and ethnographic) located within the geographical parameters outlined in this document (the fields in the southern area of the Johnson Ferry Unit) will be addressed as required under the terms of the National Historic Preservation Act and the National Environmental Policy Act. Specific compliance with Section 106 of the National Historic Preservation Act, required for the proposed undertakings is being completed concurrently with this Environmental Assessment and will be submitted separately.

Identified cultural resources in the southern portion of the Johnson Ferry Unit are archeological in nature, though there are a variety of documented historical activities associated with the area. Located within the project area is a potential Native American village site. The fields also were used agriculturally, as polo fields, and as recreational sporting fields. Thus, there are a minimum of three distinct cultural layers that contribute to the overall character of the cultural setting.

#### Archeological Resources

The fields in the southern portion of the Johnson Ferry Unit contain two archeological sites that are potentially eligible for the National Register of Historic Places. An archeological report and survey of the Johnson Ferry South fields by the Archeological Survey of Cobb County in 1985 (Meier, 1985) states that the fields constitute portions of two prehistoric sites: site 9-Co-145, a Mississippi Period village and site 9-Co-45, an Early Mississippi Period village site (Woodstock Phase, circa A.D. 800-1100). This 1985 report integrates archeological information gathered from 1970-1972 aerial photographs of the area, surface collections, as well as information from surveys of site 9-Co-45 done in 1973 and 1975-76.

The 1973 survey of 9-Co-45 resulted in the discovery of four features, all but one of which had "Woodstock Complicated Stamp pottery in association." The fourth site was assumed to be an Archaic Period pit. The Woodstock village site is thought to be "possibly a seasonal camp with semi-permanent houses." Test excavations of site 9-Co-45 conducted in 1975-76 recovered "Woodstock ceramics from cooking and/or storage pits at depths to five feet below the present surface." (Meier, 1985)

Site 9-Co-145, used as a polo playing field until 1988, was not excavated by Cobb County for the 1985 archeological report as un-compacted soil was deemed a potential hazard to polo players and horses. No official archeological surveys have been done since. Surface collections were conducted along a dirt track that surrounded the polo field, presumably around the time of the 1985 report. These surface collections, according to Meier (1985), yielded "several pounds" of artifacts, such as "whole and fragmented stone tools and weapons, lithic debitage, ceramic materials of prehistoric manufacture, and early 19<sup>th</sup> century commercial ceramics from the Pioneer Period (1780-1840)." No recent surface recoveries in the southern portion of Johnson Ferry Unit fields by park personnel or visitors are known.

Meier (1985) states that both sites (9-Co-145 and 9-Co-45) "may have deep, undetected cultural deposits below those occupational levels identified to date." Furthermore, the analysis by the Archeological Survey of Cobb County states that house-floor patterns are visible in aerial photographs taken of both sites.

In addition to the archeological evidence found, an oral history of the land by Jack Spaulding, former editor of the Atlanta Journal, states that the property was a "known

Indian habitation." Spaulding also stated that plowing of the land in the early 20<sup>th</sup> century uncovered many artifacts (Meier, 1985).

Numerous other archeological sites representing various historic and prehistoric time periods have been found along the Chattahoochee River both upstream and downstream of the project area (Ehrenhard, 1980). Though not relevant to the actions proposed in this document, it is safe to assume that the Chattahoochee River corridor in this region harbors rich and diverse archeological resources.

#### **Historical Resources**

There are no known historical structures or properties in this area that are potentially eligible for the National Historic Register. Furthermore, Chattahoochee River National Recreation Area has no comprehensive historical record detailing specific use of the southern portion of the Johnson Ferry Unit from the 12<sup>th</sup> to the 20<sup>th</sup> century. Without concrete evidence, it is difficult to make even small inferences as to activity on these fields during this time period. General information concerning Cherokee and Creek activities along the Chattahoochee River is provided due to the lack of site-specific archeological or historical documentation during this time period.

Historical documentation of Native Americans in the southeastern U.S., specifically the Creek and Cherokee, did not occur until 1540 (Ehrenhard, 1980). Broadly speaking, Cherokee and Creek towns and villages had "25 to 100 or more houses radiating in little square compounds from a central governmental and ceremonial square. Both the Creek and Cherokee constructed circular, conical roofed winter 'hot houses'. . . Summer dwellings tended to be rectangular, gabled structures (Ehrenhard, 1980)."

Maize, beans and squash were the primary staples grown agriculturally and agricultural practices are referred to as "intensive, in that a sizable quantity of food was grown on a rather small area of land, i.e., the rich alluvial bottom lands along the courses of streams and rivers (Ehrenhard, 1980)." Given this information and given that several historic Native American fish weirs are located upstream and downstream from these fields, it is possible that the southern portion of the Johnson Ferry Unit continued to be used by Native Americans during historical times.

The only archeological evidence of any historic activity in this area, as stated above, are some early 19<sup>th</sup> century commercial ceramics (1780-1840) found in the area during surface collections. These ceramics, as stated by Meier (1985), may indicate use of the land by the Cherokee. Such occupation has not been confirmed.

Jack Spaulding's oral history implies that intensive agricultural use of the land began in the first decades of the 20<sup>th</sup> century (Meier, 1985). According to Spaulding, initial plowing of the fields during this time resulted in the recovery of numerous artifacts, the locations of which are not known today. However, agricultural practices and/or the raising of livestock in this area could have begun much earlier.

There is no known physical evidence of any historic agriculturally related buildings or structures on the land, though a barn was located near to the fields. It is possible that regular flooding of the area in conjunction with the wetland indicators found would have deterred construction of permanent structures.

Spaulding presumably acquired the land from those farming it sometime during the early to mid- 20<sup>th</sup> century. The next known owner of the land was James Shelby Charles, who purchased the property in 1953.

Photographs indicate that, as of 1978, the land was used for cattle grazing, but it is not known to what extent. In the 1980s the land was leased from Charles by The Barn on Columns Dr., LTD. "The Barn" used the fields for polo matches as well as to graze horses. The fields were used actively as polo fields until 1988, when the National Park Service purchased the land from the Charles estate.

Since the park's purchase of the land in 1988, the fields have been mowed routinely and used as active recreational areas. For the past ten years the fields have been leased by a concessionaire to local sports teams for use as practice and game fields.

# **Ethnographic Resources**

Ethnographic resources, as defined by the *Management Policies 2001*, are, "objects and places, including sites, structures, landscapes, and natural resources, with traditional cultural meaning and value to associated peoples."

To the knowledge of Chattahoochee River National Recreation Area, no group has made any claim that the fields are an ethnographic resource. The park has contacted numerous groups in the area to inform them of its plan to cease mowing the fields and no person or group has objected on the basis that the fields, as they are now, are an ethnographic resource. A newspaper article concerning this project also has yielded no such claim. In addition, no Native American groups or descendents of farmers in the area have identified these fields as ethnographic resources.

Recreational use of these fields in the past two decades has established a relationship between park visitors and the land itself. Though this relationship does not qualify the fields as ethnographic resources, the park strives to enhance and expand the visitor experience through proper management of cultural and natural resources.

#### Socio-Economic Environment

#### Aesthetic Resources

The Chattahoochee River National Recreation Area represents a large portion of the protected land and greenspace within the Metro-Atlanta area. Large single-family homes and associated urban development surround the project area. Because of this, the artificially contained wetlands, artificially straightened streams and clear-cut open fields

of the southern portion of the Johnson Ferry Unit are prized by local residents as 'natural areas'. Unfortunately, there is very little unaltered natural habitat within the unit.

The floodplain of the Chattahoochee River, prior to the influence of agriculture and urban development, would have been forested with mixed bottomland hardwood species. Stream channels would have meandered through sprawling wetlands. The understory and herb layer would have been full of a wide diversity of small trees, shrubs, and native wildflowers. The existing condition within the project area is, although aesthetically pleasing as a reminder of a pastoral landscape, does not reflect the beauty that a true natural area has to offer.

# Recreation Resources

The open fields found within the project area have been utilized by numerous organized sport teams for active recreation. Passive, individual-based recreation, such as hiking, picnicking, bird watching, and fishing are also popular within the southern portion of the Johnson Ferry Unit.

#### Hazardous, Toxic and Radioactive Waste

There are no known underground storage tanks within the southern portion of the Johnson Ferry Unit. Additionally, no hazardous, toxic or radioactive waste has been identified within the unit.

#### IV. ENVIRONMENTAL EFFECTS

# Terminology/Methodology

This section discusses the potential environmental effects of both the No Action/Active Recreation alternative and the Environmentally Preferred/Passive Recreation alternative. The following definitions apply to the terms used throughout the discussion:

- Adverse Effect an action or activity is said to have an adverse effect on a resource if it is accepted, by experts in the related field, that the action or activity would result in a harmful or unfavorable outcome where the individual resource is concerned and peer-reviewed literature is available to support this conclusion;
- Potential Adverse Effect an action or activity is said to have a potential adverse effect on a resource if experts in the related field believe that the action will result in a harmful or unfavorable outcome where the individual resource is concerned, but peer-reviewed literature is either inconclusive or indirectly supports the conclusion that the action or activity would result in an adverse effect;
- Not Likely to have an effect an action or activity is not likely to have an effect a resource if experts in the related field believe that it is not reasonable to expect the action or activity to bring about change or cause something about the condition of the resource to different from its existing state;

- Positive Effect an action or activity is said to have a positive effect on a resource if it is accepted, by experts in the related field, that the action or activity would result in a beneficial, favorable, or advantageous outcome where the individual resource is concerned and peer-reviewed literature is available to support this conclusion;
- Potential Positive Effect an action or activity is said to have a potential positive effect on a resource if experts in the related field believe that the action will result in a beneficial, favorable, or advantageous outcome where the individual resource is concerned, but peer-reviewed literature is either inconclusive or indirectly supports the conclusion that the action or activity would result in a positive effect;

For the purposes of this document, an "expert in the related field" is defined as a scientist or professional holding a related degree from a state-recognized university, college, or institute of higher education. An agency or organization that is universally recognized as a source of information or guidance for a specific resource, or that has been give regulatory jurisdiction over a specific resource, is also considered to be an "expert in the related field" for the purposes of this document. For example, the U.S. Fish and Wildlife Service is considered to be an expert in the field of threatened and endangered species.

CRNRA, in the preparation of this document, gathered information from experts in the fields of natural, physical, cultural, and socio-economic resources. This document presents the gathered information in discussions designed to measures the impacts of the No Action/Open Recreation alternative and the Environmentally Preferred/Passive Recreation alternative in a positive/negative framework. Based in National Park Service ethic and philosophy, the discussions assume that natural environments provide higher ecological value than that of unnatural systems. Studies to quantify the impacts of human alteration and use on the natural and cultural environment were not conducted. Therefore, the alternatives are discussed according to their potential to have an effect the environment and the type of effect they might have (adverse effect, potential adverse effect, not likely to have an effect, positive effect, potential positive effect). Table 3, Summary of Environmental Effects provides a brief overview of the effects discussed in the text

The *Director's Order #12* handbook instructs National Park Service decision makers to consider resource impairment for each resource category analyzed through the NEPA process. According to *Management Policies 2001*, an impairment is an impact that would harm the integrity of park resources or values. An adverse effect may constitute an impairment if it affects a resource whose value or conservation is identified in the establishing legislation of the park, is key to the natural or cultural integrity of the park, or is identified in the park's GMP or other planning documents. Neither the No Action/Active Recreation Alternative nor the Environmentally Preferred/Passive Recreation alternative would result in resource impairment as defined above.

Table 3
Summary of Environmental Effects

Resource Type	No Action/Open Recreation Alternative	Preferred/Passive Recreation
		Alternative
Wetlands (Special Aquatic Site)	Adverse Effect	Positive Effect
Floodplains (Special Aquatic	Adverse Effect	Positive Effect
Site)		
Streams (Special Aquatic Site)	Adverse Effect	Positive Effect
Protected Species	Adverse Effect	Positive Effect
Fish and Wildlife	Potential Adverse Effect	Positive Effect
Migratory Birds	Potential Adverse Effect	Potential Positive Effect
Air Quality	Not Likely to Have an Effect	Not Likely to Have an Effect
Water Quality	Potential Adverse Effect	Positive Effect
Soils/Geology	Potential Adverse Effect	Positive Effect
Noise	Not Likely to Have an Effect	Potential Positive Effect
Archaeology	Potential Adverse Effect	Positive Effect
History	Not Likely to Have an Effect	Not Likely to Have an Effect
Ethnographic	Not Likely to Have an Effect	Not Likely to Have an Effect
Natural Aesthetics	Adverse Effect	Positive Effect
Passive Recreation	Adverse Effect	Positive Effect
Active Recreation	Not Likely to Have an Effect	Potential Adverse Effect

#### Natural Resources

# Special Aquatic Sites (Wetlands, Floodplains, Streams)

Five streams and one wetland were identified within the southern portion of the Johnson Ferry Unit. The entire unit is deemed to be a special aquatic site requiring protection under the Executive Order for Floodplain Protection.

# No Action/Open Recreation

The potential effects to special aquatic resources associated with No Action/Open Recreation alternative are as follows:

- Soil compaction (and associated decrease in bioactivity);
- Soil erosion (increased stream and river sedimentation):
- Continued alteration of fluvial processes;
- Continuance of degraded water quality.

According to the U.S. Department of Agriculture (http://www.agric.gov.ab.ca/sustain/woodlot/woodlot5.html):

Soil compaction is the process of increasing soil density by packing the particles closer together and reducing the pore space. Soil compaction can reduce and disrupt soil porosity, and decrease water and air movement into and throughout the soil. The result is poor soil aeration, poor root penetration, limited water movement and reduced activity of soil organisms involved in nutrient cycling. Soil compaction can also increase surface water runoff, which may lead to soil erosion and increased sedimentation in watersheds.

Farm animals, equipment/vehicles, structures, and even heavy human foot traffic are known causal agents of soil compaction. The fields in the southern portion of the Johnson Ferry Unit have been the site of active recreation for over ten years. At its most used point, as many as 50 organized sporting event practices were held at the field per week. This heavy human use taxes delicate floodplain soils and their associated biota. Data specific to the Johnson Ferry Unit does not exist, but the causes and results of soil compaction are well known. The No Action/Open Recreation alternative will most likely result in continued soil compaction and reduction in soil organisms because it allows heavy human foot traffic throughout the unit.

Rainwater run-off in forested areas is generally slow, as vegetation intercepts and slows drainage. In cleared areas, water run-off is faster. Rapid run-off can result in increased land and stream erosion. Sedimentation from erosion is generally considered to be the most prevalent form of pollution affecting streams and rivers in the United States. Increased erosional run-off results in incised stream channels, reduced diversity in aquatic life forms, and altered floodflow processes.

The effects of stream and river sedimentation are visible in the Johnson Ferry project area. The maintained exotic grass fields do not allow for natural percolation and flow of water though the floodplain. Rainwater washed from the adjacent hillside into the artificially straightened stream channels and flows rapidly to the Chattahoochee River, taking with it soil washed away by the energy of the unnaturally fast-flowing water. Under these conditions, stream channels rapidly become incised, eroded, and unstable, while wetlands become silted and/or unnaturally dry. These effects can be seen all of the streams and wetlands found within the southern portion of the Johnson Ferry Unit. The No Action/Active Recreation alternative would take no action to remedy this problem and would, because it would continue to support the unnatural conditions that lead to soil erosion, have an adverse effect on water quality in the area.

In conclusion, because of the No Action/Open Recreation Alternative would continue to allow the active recreation activities that increase soil compaction and decrease natural water percolation and flow through special aquatic sites found in the southern portion of the Johnson Ferry Unit, this alternative is determined to have an adverse effect on wetlands, floodplains, and streams. However, this alternative is not expected to result in resource impairment.

# Environmentally Preferred/Passive Recreation

In contrast, the Environmentally Preferred/Passive Recreation alternative would allow the park, if funding sources can be located, to restore natural function to the floodplain, wetland, and streams of the southern portion of the Johnson Ferry Unit. This may result in the following:

- Increase in soil bioactivity;
- Decrease in soil erosion;
- Decrease in stream and river sedimentation;
- Possible restoration of fluvial processes;
- Possible enhancement of water quality.

Unfortunately, the potential future benefits of the Environmentally Preferred/Passive Recreation alternative cannot be guaranteed. Under this alternative, CRNRA would encourage natural soil recovery by, if funding exists, actively revegetating the area with native species or, if funding cannot be obtained, allowing native vegetation to seed in naturally over time. If a substantial funding source is obtained, the artificially straightened stream channels could be re-meandered and wetlands that have been drained/ditched could be restored. Restoration projects of this type have been conducted all over the country resulting in the above-mentioned benefits to special aquatic sites. Under the Environmentally Preferred/Passive Recreation alternative, CRNRA would utilize local park scientists as well as nationally based park service scientists to help ensure that the environment in the project area is improved to the fullest extent possible, while still allowing for passive recreation use.

Restoration activities, as described above, would be documented through further NEPA analysis. The Environmentally Preferred/Passive Recreation alternative would stop active recreation use in the southern portion of the Johnson Ferry Unit. This alternative is expected to have a positive effect on special aquatic sites (wetlands, floodplains, streams) because it would eliminate the active recreation that leads to increased soil compaction and increased siltation

# **Protected Species**

# No Action/Open Recreation

The extreme adverse effects that invasive exotic species have on native flora and fauna are well known. The U.S. Invasive Species Council (www.invasivespecies.gov) reports that invasive species are responsible for the decline of nearly one-half of all of the species listed as threatened or endangered. The dominant portion of the exotic pasture grasses found in the project area are not invasive, but they have displaced local native species, reducing the diversity of native plants and animals that could find habitat there. As this diversity is reduced, the ability of the area to provide habitat for rare species, which often require specialized diverse habitats, is reduced.

Unfortunately, one grass identified within the field is an invasive exotic. Johnson grass (*Sorghum halepense*) is known to occur in all warm-temperate regions of the world even though it is native only to the Mediterranean. The grass requires significant amounts of sunlight and takes advantage of cleared areas like the southern portion of the Johnson Ferry Unit in order to establish a source population from which to invade natural areas. The No Action/Active Recreation alternative would allow the open fields to be maintained in exotic grasses. In addition to disallowing native biodiversity, this alternative allows exotic invasive grasses such as Johnson grass to form source populations from which it can take over other protected lands within the Metropolitan area.

CRNRA has not identified any protected species within the Southern portion of the Johnson Ferry area. Potential habitat has been identified for four birds, two fish, two freshwater mussels, and three terrestrial plants. The species identified as having potential habitat within the project area are not expected to exist there due to the impacted nature of the land. The No Action/Active Recreation alternative would allow this impacted state to continue.

Recent analysis of satellite photography has led scientists to conclude that the metro-Atlanta area is loosing as much as 50 acres of forest per day (<a href="www.treesatlanta.com">www.treesatlanta.com</a>). This extremely rapid loss of wildlife habitat puts additional pressures on public lands to provide habitat for displaced animals and plants. Although it is expected that the No Action/Active Recreation alternative would not have a direct negative effect on protected species, the maintenance of exotic pasture grasses in a national park designated to protect public resources such as rare species could be construed to contribute to the cumulative loss of rare habitats (and rare species) in the area.

In summary, the No Action/Open Recreation Alternative could potentially have an adverse effect on protected species because it would require the park to continue maintaining an unnatural environment in the southern portion of the Johnson Ferry Unit, which would not provide the specialized habitat required by many of the species facing displacement in the Atlanta area. However, this alternative is not expected to result in resource impairment.

# Environmentally Preferred/Passive Recreation

The Environmentally Preferred/Passive Recreation alternative would disallow organized, high-capacity sporting events in the project area. Under this alternative, CRNRA would encourage the re-introduction of native species, through restoration activities (if funding is acquired) or though the negation of mowing activities (if restoration funding is not acquired). This alternative may have a positive benefit to protected species in the area. Visitors would be encouraged to access the area in order to enjoy wildlife viewing, hiking, fishing, and other passive recreational pursuits, thus enhancing the environmental experience of park visitors and informing the metro-Atlanta public about natural environments and threats to protected species caused by habitat loss. The restoration of

degraded habitat within the national park is expected to provide an opportunity to relocate and/or reintroduce protected species threatened by development in the metro-Atlanta area and possibly prevent certain species from becoming extirpated.

The Environmentally Preferred/Passive Recreation alternative is expected to have a positive effect on protected species because cessation of active recreation in the project area would allow the park to provide more natural habitat for rare species.

#### Fish and Wildlife Resources

# No Action/Open Recreation

The open fields found in the southern portion of the Johnson Ferry Unit do not represent unusual habitat for fish and wildlife in the piedmont of Georgia. As stated earlier, pasture-like fields represent a large percentage of the overall habitat available in the entire ACF river basin. Nonetheless, a wide variety of fish and wildlife resources can be found in the area.

Under the No Action/Open Recreation alternative, the diversity of native fish and wildlife is not expected to increase. Maintaining open exotic grass lawns will not allow native species to move back into the area. Species currently finding habitat within the unit are expected to continue to find habitat if the status quo is maintained, but conflicts between fish and wildlife and active recreational use may ensue. Beaver are among the native species active in the project area. Portions of the floodplain adjacent to the active recreation fields are perpetually inundated because of natural beaver activity. This flooding often threatens the activity fields. Consequently, in order to maintain the fields during wet seasons, beaver would have to be controlled.

Although the No Action/Open Recreation alternative is not expected to significantly alter the existing fish and wildlife diversity in the project area, it may have an adverse effect on fish and wildlife in the future. Maintenance of the exotic grass fields limits the ability of native species to find habitat in the area and the existing wildlife, including beaver, may have to be controlled in order to provide dry playing areas. The No Action/Open Recreation alternative would result in a potential adverse effect on wildlife in the project area, but would not result in resource impairment.

#### Environmentally Preferred/Passive Recreation

The Environmentally Preferred/Passive Recreation alternative is expected to enhance fish and wildlife habitat and diversity in the area. Restoration of native species is expected to result in an increased ability of the area to prove forage for a greater number of animals and is expected to increase the ability of native plants to proliferate. Furthermore, the existing native flora and fauna found in the un-mowed areas of the southern portion of the Johnson Ferry Unit would serve as source populations for colonization of the exotic grass fields if active recreation were disallowed.

The Environmentally Preferred/Passive Recreation alternative is expected to have a positive effect on wildlife resources in the southern portion of the Johnson Ferry Unit. Cessation of active recreation use, because it would decrease the erosion potential and aid in the restoration of hydrological function (see the *Special Aquatic Sites* section of this document) as well as increase native flora diversity is expected to increase the diversity of wildlife in the area.

# Migratory Birds

Formal bird surveys have not been conducted within CRNRA. The park has no known records of migratory bird usage in the Johnson Ferry area. This lack of information makes it difficult to predict the impact of both alternatives on migratory bird species. However, general biology tells us that healthy natural systems are more capable of providing habitat for a variety of species than altered unnatural systems.

# No Action/Open Recreation

The No Action /Open Recreation alternative would maintain the existing unnatural conditions within the southern portion of the Johnson Ferry Unit. If migratory birds have been using the area under these conditions, the continuance of active recreation use is not expected to cause the birds to discontinue their use of the area. However, because this alternative limits the quantity and quality of natural habitat in the area, the No Action/Open Recreation Alternative may prohibit use of the area by migratory birds that require specialized natural habitats found in the floodplain of the Chattahoochee River prior to human alteration. It is, therefore, assumed that the maintenance of unnatural habitat conditions, as is proposed in the No Action/Open Recreation alternative, would potentially have an adverse effect on migratory bird species, but would not result in resource impairment.

# Environmentally Preferred/Passive Recreation

The Environmentally Preferred/Passive Recreation alternative would potentially have a positive effect on migratory birds because it would promote a natural system, which would be more capable of providing habitat for a more diverse array of wildlife.

#### Physical Environment

#### Air Quality

#### No Action/Open Recreation

The No Action/Active Recreation alternative is not likely to have an effect on air quality within the project area or result in resource impairment. This alternative would not increase or decrease traffic within the Metro-Atlanta area, the primary cause of air pollution in the city.

# Environmentally Preferred/Passive Recreation

The Environmentally Preferred/Passive Recreation alternative is not expected to impact air quality within the project area or result in resource impairment. Persons who have traveled by car to the activity fields within the Johnson Ferry Unit would most likely travel by car to other venues. Accordingly, this alternative would not increase or decrease traffic within the Metro-Atlanta area, the primary cause of air pollution in the city. Therefore, the Environmentally Preferred/Passive Recreation alternative is not likely to have an effect on air quality.

# Water Quality

Neither the No Action/Open Recreation alternative nor the Environmentally Preferred/Passive Recreation alternative are expected to reduce the amount of human sewage pollutants entering the Chattahoochee River, one of the major pollutants affecting the river today. However, the two alternatives do differ significantly in their ability to mitigate the negative effects of urban development on the Chattahoochee River and its tributaries.

# No Action/Open Recreation

The No Action/Active Recreation alternative would require the park to maintain an unnatural condition in the project area. As mentioned earlier, this alternative is not consistent with the National Park Service mandates and policies concerning natural resource protection cited in Related Environmental Documentation and Guidance section of this document. The National Park Service requires the preservation or restoration of natural floodplain and wetland function in order to ensure that the greatest natural benefit of these sites is realized. This mandate is based on an assumption that natural systems provide the greatest natural benefit. Although no studies exists that compare the ability of the artificially altered wetland and floodplain system found within the southern portion of the Johnson Ferry Unit to the ability of the system to filter water pollutants prior to human alteration, the park assumes that the maintenance of unnatural open exotic vegetation fields limits the ability of the floodplain and associated wetland to function in the removal of water quality pollutants before they reach the Chattahoochee River. These factors have led CRNRA to conclude that the No Action/Open Recreation alternative would have the potential to cause an adverse effect on water quality, but would not result in resource impairment.

#### Environmentally Preferred/Passive Recreation

The beneficial functions of wetlands and floodplains are well known. Healthy floodplains and wetlands buffer shorelines against erosion, help control increases in the rate and volume of runoff in urban areas, and help improve water quality by removing or retaining pollutants before they reach open water or watercourses (<a href="https://www.epa.gov/owow/wetlands/facts/fact2.htm">www.epa.gov/owow/wetlands/facts/fact2.htm</a>). The Environmentally Preferred/Passive

Recreation alternative would allow the park to restore natural wetland and floodplain function to the floodplain of the Chattahoochee River. This is expected to result in an increase in the ability of the area to absorb urban pollutants and sediments before they reach the Chattahoochee River. Dense native vegetation would be able to remove or retain nutrients, process organic wastes, and reduce sediment before it reaches open water. Because of this, the Environmentally Preferred/Passive Recreation alternative is expected to have a positive effect on water quality.

# Soils/Geology

#### No Action/Active Recreation

The No Action/Active Recreation alternative could have an adverse effect on soils in the project area. Large numbers of people gathering on fragile floodplain soils leads to compaction, as discussed in the *Special Aquatic Sites* section of this document. The maintenance of the river floodplain in mowed exotic grasses increases the potential for soil erosion; there are no canopy and subcanopy species available to dissipate the energy of falling rain and no shrubs or litter layer to dissipate the energy of overland flowing water. Therefore, the No Action/Open Recreation alternative has the potential to have an adverse effect on soils, but would not result in resource impairment.

# Environmentally Preferred/Passive Recreation

The Environmentally Preferred/Passive Recreation alternative would have a positive effect on soils. This alternative would allow for revegetation, which would most likely increase the diversity of micro and macro organisms in the soil. Revegetation would also decrease the potential for soil erosion.

#### Noise

#### No Action/Active Recreation

The No Action/Active Recreation alternative is not expected to have a long-term adverse effect on noise in the area; however, noise levels could increase during active recreation sport competitions where large numbers of individuals gather to cheer teams. The noise complaints that the park has received in the past when organized sport competitions have been held in the area would most likely continue under this alternative. Therefore, the No Action/Open Recreation alternative is not likely to have an effect on noise in the project area or result in resource impairment.

#### Environmentally Preferred/Passive Recreation

The Environmentally Preferred/Passive Recreation alternative may have a positive effect on noise within the southern portion of the Johnson Ferry Unit. This alternative would allow revegetation, which would aid in the filtering of noise from adjacent roadways. Additionally, the organized sport competitions (active recreation) would no longer be

allowable under the Environmentally Preferred/Passive Recreation alternative. As mentioned earlier, these sporting events have resulted in noise levels deemed to be unacceptable by local residents. Therefore, the Environmentally Preferred/Passive Recreation alternative would potentially have a positive effect of noise in the project area.

#### **Cultural Resources**

The effects statement concerning cultural resources within the southern portion of the Johnson Ferry Unit will address the possible impacts of the No Action/Open Recreation alternative and the Environmentally Preferred/Passive Recreation alternative on the archeological, historical and ethnographic resources in the area. This document, pursuant to the NEPA process, has identified no historical or ethnographic resources. Therefore, the focus of the Effects Statement will be the known archeological resources in the fields. Any historical or ethnographic resources identified in the future will be assessed and managed according to National Park Service guidelines.

#### Archeological Resources

# No Action/Open Recreation

While no site-specific study has been conducted in order to assess the impacts of organized sports and recreational activities on the archeological resources located on these fields, common sense and basic visual assessment indicate that the increasingly intense open recreational activities that have taken place on these fields have the potential to create an adverse effect on archeological resources.

Firstly, the archeological evidence sited earlier refers to the fact that pounds of artifacts were collected from the track around the polo field during surface collections. Given the high pedestrian traffic in this area, which only seems to have increased with time, it is logical to surmise that a great many of these surface artifacts have been taken from the park. Furthermore, cleared land and short, mowed grass logically contribute to greater visibility of the ground and, therefore, of any artifacts that may be located close to the surface.

Secondly, erosional problems caused both by the frequent mowing of the fields and the continued maintenance of reduced riparian buffer may be causing damage to archeological resources. The fields, as they stand now, allow for a riparian buffer too small to handle the force of the Chattahoochee River. Massive bank erosion is a problem along the riverbank where these fields are located and it is possible that some archeological resources already have been lost.

Thirdly, it is possible that the soil compaction caused by the frequent and intense recreational activities, such as soccer and lacrosse, may adversely affect the archeological resources, though further study would be needed to prove such a hypothesis.

In conclusion, the No Action/Open Recreation alternative could potentially have an adverse effect on archaeological resources within the southern portion of the Johnson Ferry Unit, but would not result in resource impairment.

#### Environmentally Preferred/Passive Recreation

The Environmentally Preferred/Passive Recreation alternative potentially would have a positive effect on the archeological resources in the southern portion of the Johnson Ferry Unit. This alternative would stop active recreation on the fields (i.e. organized sports activities) and would stop active mowing of these fields.

Cessation of mowing will allow for increased vegetation of the fields and the riparian buffer. Increased riparian buffers and increased floodplain vegetation are proven methods of restoring habitat and decreasing erosion. This positive effect on the natural resources will have a potentially positive effect on archeological resources by reducing the probability and magnitude of erosion. Furthermore, increased vegetation potentially will aid in protecting any surface artifacts that remain in the area.

In addition to the cessation of mowing, closing these fields to active recreational use also will have a potentially positive effect on the archeological resources. While there is no concrete evidence to show that soil compaction resulting from intense recreational use will negatively effect archeological resources in these fields, the cessation of sporting events on the field will reduce the concentration of visitors on the archeological sites. As active recreational sites, these fields serve to concentrate large numbers of visitors in a small space relative to the overall park area.

Passive recreational use, on the other hand, such as hiking, picnicking, fishing and wildlife viewing will promote distribution of visitors along the current trail system, which runs throughout the entire southern portion of Johnson Ferry Unit. Therefore, these passive recreational activities will not tend to congregate large numbers of visitors in one location. Therefore, this alternative would assist the park in its mandate to take, "proactive measures that protect [cultural] resources from vandalism and looting, and maintain or improve their condition by limiting damage due to natural and human agents" (Management Policies 2001).

The Environmentally Preferred/Passive Recreation alternative allows for potential natural resource restoration of these fields. As previously stated in this document, this alternative would allow for the removal of exotic invasive vegetation and, "would set the stage for re-meandering artificially straightened (channelized) streams, restoring wetland hydrology and vegetation, and allowing the area to function as natural habitat for wildlife and vegetation." At this time, no site-specific plans have been determined for such restoration activities. The removal of exotic invasive vegetation, the majority of which has been introduced to the area in the past one hundred years, would not affect the archeological resources or landscape. If funding were secured for the re-meandering of streams in the fields, a thorough archeological survey would be done according to National Park Service standards. Thereafter, any further compliance requirements

pursuant to NEPA and the National Historic Preservation Act would be tiered from this document. All necessary compliance and mitigation would be completed prior to project implementation.

Currently, the park knows of no reliable description of the natural landscape of the southern portion of the Johnson Ferry Unit prior to the 20<sup>th</sup> century. Therefore, it is difficult to know how long the streams in these fields have been channelized. Presumably, the streams were channelized during intense agricultural use in the 19<sup>th</sup> and 20<sup>th</sup> centuries. Given a comprehensive understanding of the archeological sites' locations and boundaries in the fields, it may be possible to determine the precise locations of these streams and, subsequently, to recreate the natural landscape present at the time of Native American habitation of the area.

As stated above, the Environmentally Preferred/Passive Recreation alternative would have a positive effect on archaeological resources in the southern portion of the Johnson Ferry Unit.

# **Historical Resources**

# No Action/Open Recreation

There are no known historic structures on the fields that are eligible or potentially eligible for the National Historic Register. Furthermore, given that the only known historic uses of the fields were agricultural in nature, and given that the current recreational uses of the fields maintain the basic agricultural structure of the area, the No Action/Open Recreation alternative is not likely to have an effect on historical resources.

#### Environmentally Preferred/Passive Recreation

The channelized streams that run through these fields are the only visible feature representative of historical agricultural practices. However, these streams do not constitute a cultural or historic landscape and represent a common agricultural practice the remnants and active use of which can be seen throughout the Georgia Piedmont today.

There are no known historic structures or landscapes in the proposed project area that are eligible or potentially eligible for the National Register of Historic Places. Therefore, the Environmentally Preferred/Passive Recreation alternative is not likely to have an effect on historical resources or result in resource impairment.

# Ethnographic Resources

# No Action/Open Recreation

There are no identified ethnographic resources associated with these fields. Therefore, the No Action/Open Recreation alternative is not likely to have an effect on ethnographic resources or result in resource impairment.

Any future claim that the fields are ethnographic resources will be assessed and acted upon according to National Park Service guidelines.

#### Environmentally Preferred/Passive Recreation

There are no identified ethnographic resources associated with these fields. Therefore, the Environmentally Preferred/Passive Recreation alternative is not likely to have an effect on ethnographic resources or result in resource impairment.

Any future claim that the fields are ethnographic resources will be assessed and acted upon according to National Park Service guidelines.

#### Socio-Economic Environment

#### Aesthetic Resources

# No Action/Open Recreation

Given that aesthetic values are highly individualized and subjective, CRNRA recognizes that some people may find the artificially contained wetlands, artificially straightened stream channels, and artificially cleared floodplain found in the southern portion of the Johnson Ferry Unit aesthetically pleasing. However, the park believes that natural systems hold more aesthetic value than artificial systems. When determining the impacts of an action on a subject value like aesthetics, the park service refers to nationally based resource management guidelines such as the *Management Policies 2001* guidebook referenced throughout this document. Because park service management policies require the restoration and preservation of natural systems, CRNRA contends that the unnatural state of the streams, wetlands, and floodplains found in the project area do not represent an aesthetic resource.

Under the guidance of the National Park Service ethic, CRNRA finds that the No Action/Open Recreation alternative would allow a practice that would result in an adverse effect on aesthetic resources in the park to continue. However, this alternative is not expected to result in resource impairment.

# Environmentally Preferred/Passive Recreation

Following the logic described above, CRNRA finds that the Environmentally Preferred/Passive Recreation alternative would have a positive effect on aesthetic resources.

# **Recreation Resources**

# No Action/Open Recreation

Many park visitors enjoy the southern portion of the Johnson Ferry Unit for active and passive recreational pursuits. In the past, the project area has been crowded to the point that recreational users in one field have collided with recreational users in another. This over crowding problem reflects the overarching need to provide more active recreational fields in the metro-Atlanta area.

The Chattahoochee River Greenway Planning and Implementation Handbook, prepared by Jordan, Jones, and Goulding for the Chattahoochee River Land Protection Campaign in the fall of 2000, addresses recreational planning in the entire Chattahoochee River basin. Recognizing that "an overused park can indicate that a certain user group is underserved," the handbook states "activity within certain sensitive areas, such as wetlands or cultural and historical sites, and natural areas should be avoided or carefully controlled." The juxtaposition of these two statements frames the problem facing CRNRA when planning for recreational opportunities within the southern portion of the Johnson Ferry Unit. Pressure from underserved user groups can quickly overwhelm and impact natural and cultural resources in sensitive areas.

The No Action/Open Recreation alternative would allow active (organized sport) recreation to continue in the sensitive floodplain and wetland habitats of the Chattahoochee River. However, the park would have to take action to address the safety concerns associated with the layout of multiple playing fields in close proximity to each other. To avoid a continuance of this safety hazard, CRNRA would have to increase the amount of land separating the recreational fields in the project area to comply with established recreational playing field standards. This would be done by reducing the number of delineated athletic fields rather than increasing the amount of floodplain cleared to provide for team sport use. If this alternative were to be chosen, the required safety changes would be made immediately.

Because the only changes that would be made would be in an effort to increase the safety of park visitors, the No Action/Open Recreation alternative is not likely to have an effect on active recreation in the project area. However, the No Action/Open Recreation alternative is expected to have an adverse effect on passive recreation use in the area because the open recreation fields do not provide diverse wildlife habitats, which would increase wildlife viewing and hiking opportunities. This alternative would not result in resource impairment.

# Environmentally Preferred/Passive Recreation

The State of Georgia adopted a Greenspace Program during the legislative session of 2000. The program is designed to encourage greenspace protection in developed and rapidly developing counties. Counties are encouraged to establish as much as twenty percent of their land area as greenspace. Through this program, the State of Georgia will provide grants to rapidly developing counties for the purchase and protection of greenspace. The program recognizes that active recreation areas such as ballparks and open-lawn playing fields do not provide the water quality and wildlife benefits of preserved, passive recreation areas. Fields that are reserved for corporate and other sporting events, such as those found in the southern portion of the Johnson Ferry Unit, do not count toward the greenspace in Cobb County. If the Environmentally Preferred/Passive Recreation alternative were chosen, the project area would be restored to a point that it could count toward greenspace in the county.

The Environmentally Preferred/Passive Recreation alternative would not allow the fields of the southern portion of the Johnson Ferry Unit to be maintained. This would result in the cessation of active recreation in the project area. Passive recreation such as hiking, boating, fishing, wildlife viewing, and picnicking would continue. As such, recreational opportunities in the project area would change, but would not be eliminated. There is a need and demand for developed and promoted active-type recreational fields; however there are more suitable locations than National Park Service sites, since the emphasis in these areas are their natural and cultural resources. The National Park Service will work with surrounding cities, counties, and other interested groups to encourage them to provide these active recreational fields within their communities. Cobb County already offers a wide variety of active recreation venues for local residents. <a href="http://www.cobbcvb.com/htmlpgs1sports/pgb\_tourn.html">http://www.cobbcvb.com/htmlpgs1sports/pgb\_tourn.html</a>). CRNRA believes that, if the Environmentally Preferred/Passive Recreation alternative were chosen, the active recreation users could find other more appropriate venues in less sensitive habitats.

Natural resource restoration is expected to result in increased opportunities for wildlife viewing and hiking and may result in enhanced fishing opportunities, as water quality would benefit under the Environmentally Preferred/Passive Recreation alternative. Appropriate active recreation venues exist in less sensitive habitats; however, CRNRA understands that these venues are under extreme pressure as more and more residents try to access them. Therefore, it is recognized that the Environmentally Preferred/Passive Recreation alternative potentially could result in an adverse effect to active recreation in the project area. However, it is expected to have positive effect on passive recreational use. This alternative would not result in resource impairment.

#### National Environmental Policy Act, Section 101(b)

NPS policy requires, in accordance with Section 101(b), that the environmentally preferred alternative meet the following criteria:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities;
- Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The cessation of active recreation in the southern portion of the Johnson Ferry Unit would allow CRNRA to comply with the management mandates of the National Park Service concerning the preservation and use of natural and cultural resources. These mandates, developed in compliance with the National Environmental Policy Act, are designed to ensure that the National Park Service continues to serve as an exemplary steward of the human environment. According to the *Director's Order #12* handbook, the environmentally preferred alternative is the alternative that will "cause the least damage to the biological and physical environment" and "which best protects, preserves, and enhances historic, cultural, and natural resources." The Environmentally Preferred/Passive Recreation alternative meets these criteria.

As discussed above, the active recreation use in the southern portion of the Johnson Ferry Unit proposed by the No Action/Open Recreation alternative does not comply with NPS resource management policy. Referring to Table 3, Summary of Environmental Effects, the No Action/Open Recreation alternative would cause an adverse effect or would have the potential to cause an adverse effect 66.7% (8 out of 12) of the identified resources, while the Environmentally Preferred/Passive Recreation alternative would cause an adverse effect or would have the potential to cause an adverse effect 8.3% (1 out of 12) of the identified resources. As such, the Environmentally Preferred/Passive Recreation alternative best meets the criteria outlined in NEPA Section 101(b) and the *Director's Order #12* handbook.

#### V. COORDINATION AND PREPARERS

#### General

This document will serve as compliance with the National Environmental Policy Act and will be subject to public input. Copies of the document will be made available for comment to the Georgia Department of Natural Resources, The U.S. Fish and Wildlife Service, the U.S. Environmental Protection Agency, The U.S. Geological Survey, the Upper Chattahoochee Riverkeeper, Cobb County government, and any other interested

group. CRNRA will accept comments according to the standards and guidelines of the National Park Service *Director's Order #12* handbook.

#### Public Comment

A public meeting will be held at the East Cobb Government Service Center (<a href="http://www.cobbcounty.org/residentservices/ccgsc.htm">http://www.cobbcounty.org/residentservices/ccgsc.htm</a>) on April 26, 2002 to discuss this Environmental Assessment. Additionally, the document will be available for public review at the park visitor contact station (1978 Island Ford Parkway; Atlanta, GA 30350). Public comments can be submitted in electronic format via the Superintendent's office (<a href="mailto:chat\_superintendent@nps.gov">chat\_superintendent@nps.gov</a>) or by mail. Comments already received from the public concerning this project are attached in Appendix A, Coordination.

#### **Preparers**

Recreation and Management Alternatives of the Southern Portion of the Johnson Ferry Unit was prepared for the National Park Service by the Chattahoochee River National Recreation Area, Division of Science and Resource Management. Credits are as follows:

- Michelle Mitchell, Natural Resource Manager Purpose and Need, Management Alternatives, Affected Environment (with the exception of Cultural Resources and Socio-Economic Environment), Environmental Effects (with the exception of Cultural Resources and Socio-Economic Environment), Coordination;
- Daniel Noon, Biological Technician graphics, photography (cover page);
- Sandra Sneckenberger, Biological Technician graphics
- Lauren Theodore, Biological Technician (trained anthropologist) Cultural Resources (Affected Environment), Socio-Economic Environment (Affected Environment), Cultural Resources (Environmental Effects), Socio-Economic Environment (Environmental Effects), graphics.

Michelle Mitchell, Natural Resource Manager, and Lauren Theodore, Biological Technician, conducted all natural resource fieldwork and surveys.

# United States Department of the Interior National Park Service Chattahoochee River National Recreation Area

# Appendix A, Coordination

Recreation and Management Alternatives for the Southern Portion of the Johnson Ferry Unit

Coordination documents to be added later, please check back.....

# United States Department of the Interior National Park Service Chattahoochee River National Recreation Area

# Appendix B, Bibliography

Recreation and Management Alternatives for the Southern Portion of the Johnson Ferry Unit

# Recreation and Management Alternatives for the Southern Portion of the Johnson Ferry Unit

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#### **BRIEFING STATEMENT**

**Bureau:** National Park Service

Issue: Environmental Assessment- Recreation and Management Alternatives for

the Southern Portion of the Johnson Ferry Unit

Park Site: Chattahoochee River National Recreation Area

Date: March 12, 2002

**BACKGROUND:** The National Park Service (NPS) authorized its concessionaire, the Chattahoochee Outdoor Center (COC) to manage and rent the Johnson Ferry fields for corporate and organized sporting events. No Environmental Assessment (EA) was conducted to evaluate potential impacts associated with managing these fields for reserved organized sporting events. On December 31, 2001 COC elected not to continue under the contract consequently the NPS initiated the Environmental Assessment (EA) process to identify management alternatives. Chattahoochee River National Recreation Area has prepared an EA to explore active (i.e. reserved organized sports) versus passive (i.e. walking, hiking, wildlife and nature observation) management alternatives. Pending the outcome of the EA, the NPS has stopped reserving the fields.

On August 31, 2000 the NPS initiated a partial closure of the playing fields due to resource degradation. At that time all identified user groups were informed by letter that COC's contract may expire on December 31, 2000 and the NPS would be managing the fields. COC subsequently decided to remain under contract for one more year (2001). Finally, in anticipation of contract expiration on December 31, 2001 the NPS sent a letter on November 23, 2001 to COC and all the organizations who had historically rented the fields, informing them of the EA process and the moratorium on any more reservations.

CURRENT STATUS: The actions proposed may be controversial. Many businesses and organizations utilized the Johnson Ferry fields for active recreation. Due to the economic slowdown one major corporate event planning firm has gone out of business significantly reducing field rental demand. The remaining businesses have been advised to seek an alternative venue pending an EA. Over the years, local residents have repeatedly complained that the organized sporting events were too loud. The Chattahoochee Plantation Community, a local homeowners association, supports the effort to reduce the active recreation activity on the fields. They have voiced an interest in having this unit of the park managed for passive recreation. To date, two newspaper articles have been written concerning this issue. The first appeared in the Marietta Daily Journal on January 26, 2002. The second appeared in the Atlanta Journal Constitution (AJC) on February 7, 2002. These articles were primarily informative in nature. In response to the AJC article the park received two phone calls. One in support of NPS actions and one opposed.

#### **CONTACT:**

Kevin Cheri, Superintendent,

Chattahoochee River National Recreation Area, 770-399-8074 extension 222

#### Dear:

It is our understanding that you have a business relationship with the Chattahoochee Outdoor Center (COC) in regard to the use of the activity fields located at the Johnson Ferry South Unit of the Chattahoochee River National Recreation Area (CRNRA).

As you may or may not be aware the National Park Service (NPS) concession contract with COC expires on December 31, 2001. Consequently, beginning January 1, 2002, the NPS will suspend leasing the Johnson Ferry fields for organized recreation activities until environmental compliance pursuant to the National Environmental Policy Act of 1969 (NEPA) is completed. We anticipate that an environmental assessment (EA) will be completed and available for a 30-day public comment period in April 2002.

Furthermore, there are a number of significant policy and environmental issues that must be considered during the EA process. Among them are:

- The 2001 NPS Management Policy (8.2) states that, "The Service is committed to providing appropriate, high quality opportunities for visitors to enjoy the parks.... However, many forms of recreation enjoyed by the public do not require a national park setting, and are more appropriate to other venues." Furthermore it states that the NPS will "defer to local, state and other federal agencies; private industry; and non-governmental organizations to meet the broader spectrum of recreational needs and demands."
- The park's Legislative History, House Report, states that "the National Recreation Area is **not** intended to provide playing fields, highly developed recreation centers or

many other worthwhile programs offered by these other agencies. Rather, the river and the associated lands are to be the resource base upon which the NPS can function to provide opportunities consistent with national park operations."

- The Johnson Ferry activity fields are located on the Chattahoochee River's floodplain with a significant portion, 65%, of the field area classified as wetlands. Consequently the continued maintenance of these areas as open fields conflicts with the intent of Executive Order (E.O.) 11988, Floodplain Management (42 Fed. Reg. 26951, May 24, 1977), which requires federal agencies to "provide leadership" in floodplain management as well as Executive Order (E.O.) 11990, Protection of Wetlands (42 Fed. Reg. 26961).
- In October 2001 the NPS became aware that the State of Georgia's archeological site database had listed one of the Johnson Ferry fields as the site of a significant Native American village. Furthermore, the database identified the site as being in "danger" due to current management practices. In addition, in a memorandum dated 11/01/1985, L. Meier, an Archeologist conducting an archeological survey of Cobb County described the site as follows "...no other village site of this cultural period holds this potential to yield significant data in the metropolitan Atlanta region (seven counties)." In November 2001 the NPS initiated actions to determine the sites eligibility to be listed on the National Register of Historic Places.
- In September 2000 the NPS began the public process of developing a General Management Plan (GMP) for the CRNRA. To date the NPS has conducted six public meetings, received over 200 written comments during a sixty day comment period and met with numerous non-governmental organizations, State, County and Federal agencies. This extensive public input process will result in the release of a draft GMP sometime in early 2002 that will be subjected to a second round of public review and comment. During that comment period the public will have an opportunity to provide input on how the CRNRA should be managed. We do anticipate however that due to our legislative mandate to restore natural resource processes and protect cultural resources, the plan will effect how we currently manage the park and specifically the fields

at Johnson Ferry. We expect that organized team sports, such as club rugby or soccer, are more suited for a city or county park and recreation setting would be curtailed or hampered by restoration efforts. If your activity falls within that type of designation it may be productive for your organization to explore alternative locations.

In closing, we hope that this information is helpful to you in planning your activities and strongly encourage you to work with local county officials to designate more active recreation space in Cobb and Fulton County. Please be assured that you will be notified when the Environmental Assessment is available for public comment.

Please contact either Assistant Superintendent William Carroll or me at 770.399.8074, extension 221 if we can be of further assistance.

Sincerely,

Kevin G. Cheri Superintendent

cc:

Chattahoochee Outdoor Center Congressman Johnny Isakson